

September 24, 1999

Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Carrier-to-Carrier Service Quality Rulemaking -
Docket No. UT-990261

Dear Ms. Washburn:

The Washington Independent Telephone Association (WITA) appreciates the opportunity to comment on whether carrier-to-carrier service quality rules are needed. Pursuant to the Notice of Opportunity to File Supplemental Comments (Notice), enclosed are the original and 19 copies of the comments and a diskette in WordPerfect 6.0/6.1 bearing an electronic copy of these comments.

Commission Staff has tentatively concluded that they would propose rules modeled on the New York Public Service Commission Order Establishing Permanent Rule on service quality standards. In reviewing the New York Public Service Commission Order, it appears that those rules are intended to address certain aspects of Bell Atlantic's Section 271 standards.

WITA suggests that instead of looking at the New York Order, the starting point should be the OSS performance measures that have grown out of the collaborative processes between incumbent local exchange carriers (ILECs) and competitive local exchange carriers (CLECs) in the states of California and Nevada. Those standards were developed after approximately a year of meetings between ILECs and CLECs. In California, the outcome of that collaborative process was memorialized in an Amended Joint Partial Settlement Agreement filed with the California Public Utilities Commission on May 3, 1999. That Settlement Agreement was submitted earlier in this docket by GTE Northwest Incorporated as part of their June 11, 1999 comments. It appears in reviewing the standards contained in the Settlement Agreement, that the standards present a negotiated, balanced approach. The balancing act in any docket focused on creating carrier-to-carrier service quality standards is to determine what performance measurements and data requirements are needed by CLECs and the Commission to determine parity of service with the cost incurred by the ILECs to provide the reports. Rather than recreating the wheel, as it were, all parties and the Washington Commission can benefit from the substantial effort that went into the development of the Settlement Agreement in the collaborative process.

Carole J. Washburn, Executive Secretary
September 24, 1999
Page Two

WITA also notes that it appears appropriate to define, in whatever rules are adopted, the carriers to which the rules will apply. Carrier-to-carrier standards should not apply to rural ILECs that are not involved in interconnection. Therefore, WITA suggests the following rule be included:

WAC 480-120-XXX **Application of collocation rules.** The collocation rules set forth in WAC 480-120-XXX to WAC 480-120-YYY shall apply to those carriers that have entered into interconnection agreements, whether by negotiation or arbitration or combination thereof, under Sections 251 and 252 of the Telecommunications Act of 1996.

Pursuant to the request listed in the Notice, copies of these comments will be served on those persons appearing on the service list provided with the Notice.

Sincerely,

TERRY A. VANN
Executive Vice President

TAV/aw
Enclosures as noted

cc: Parties of Record
RIA Committee Members
WITA Board Members